

Johnson  
Davis

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
(NEWPORT NEWS DIVISION)



YASIR QAHTAN SAUD

-PLAINTIFF-

VS

META PLATFORMS, INC.

[FORMERLY FACEBOOK INC]

-DEFENDANT-

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IN THE CASE OF:

U.S.D.C. No. 25-CR-00041

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-CIVIL COMPLAINT-

FOR DEFAMATION, NEGLIGENCE, FALSE LIGHT, AND NEGLIGENT INFLICTION OF  
EMOTIONAL DISTRESS.

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JURY TRIAL DEMANDED

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INTRODUCTION

1). Plaintiff YASIR QAHTAN SAUD ("PLAINTIFF") brings this action against

Meta platforms,inc(formerly facebook,inc.)("defendant"or"facebook") for defamation,negligence,false light invasion of privacy,and negligent infliction of emotional distress arising from facebook's false and recless report to the national center for missing and exploited children("NCMEC")alleging that plaintiff distributed child pornography through facebook messenger.

2).Facebooks false and unverified allegations directly resulted in plaintiffs wrongful arrest,imprisonment,and irreparable harm to his reputation,carrer,and emotional well-being.dispite a thorough investigation by the federal bureau of investigation("FBI"),no evidence of child pornography was found on any of plaintiffs devices.

3).Facebook acted with reckless disregard for the truth by failing to verify the accuracy of its claims before reporting them to law enforcement,thereby causing plaintiff severe and lasting harm.see Gertz v. Robertswelch,inc. 418 U.S. 323(1974)

-JURISDICTION AND VENUE-

4).This court has jurisdiction pursuant to 28 U.S.C. §1332(diversity jurisdiction)because the parties are citizens of different states and the amount in controversy exceeds \$75,000.Additionally,this court has jurisdiction under 28 U.S.C. §1331(federal question jurisdiction)because the case involves federal privacy rights and corporate negligence.

5).Venue is proper in this district under 28 U.S.C. §1391(b)because defendant conducts substatntial business in this jurisdiction,and a significant portion of the events giving rise to this action occurred here.

-PARTIES-

6).\*\*PLAINTIFF\*\* YASIR QAHTAN SAUD is a war veteran and former iraqi intelligence officer currently incarcerated at OAKDALE FEDERAL INSTITUTION in louisiana.

7).\*\*DEFENDANT\*\* Meta platforms,inc(formely facebook,inc)ia a delaware corporation with its principal place of business in menlo park ,California.Facebook owns and operates the facebook messenger platform,which was the subject of the false report at issue in this case.

-FACTUAL ALLEGATIONS-

8).In or around august,2020,Facebook falsely reported to NCMEC that plaintiff engaged in the distribution of child pornography through facebook messenger.

9).Facebook's report included the following unverified and false information: A).An ip. address allegedly linked to plaintiff,without proper verification.

B).An email address falsely attributed to plaintiff,despite plaintiff not having a facebook account associated with the alleged activity.

C).Plaintiff name and image,obtained through unknown and unverified means.

10).Based on facebook's report,the FBI initiated an investigation, seizing 36 electronic devices from plaintiff's home.After a thorough forensic examination,the FBI found no evidence of child pornography on plaintiff's devices.the inventory report explicitly stated,in bold letters,"NOTHING FOUND".

11).The files cited in the govertment's case(e.g."KBIS3146.mov"and IMG\_0394.mov")were not found on any devices or account belonging to plaintiff.

12).Facebook's false and unverified report directly caused plaintiff 's wrongful arrest,imprisonment,and irreparable harm to his reputa-tion,carrer,and emotional well-being.

13).Facebook failed to exercise reasonable care to verify the accu-racy of its allegations before reporting plaintiff to NCMEC and law enforcement.

14).Facebook's actions violated plaintiff's privacy rights and caused severe and lasting harm to his personal and professional life.see Hustler Magazine v. Falwell 485 U.S.(1988).

-CAUSES OF ACTION-

\*\*COUNT 1 DEFAMATION(libel & slander)\*\*

15).Facebook knowingly or reclessly made false statements to NCMEC and law enforcement,falsely accusing plaintiff of distributing child pornography.

16).These false statements were published by NCMEC,the FBI and other law enforcement agencies,leading to plaintiff's wrongful prosecution and imprisonment.

17).Facebook acted with actual malice or recless disregard for the truth by failing to veryfy the accuracy of its allegation before publishing them.see New York Times Co. v. Sullivan 376 U.S. 254(1964).

18).As direct and proximate result of facebook's defamatory statement ,plaintiff suffered severe harm,including wrongful imprisonment,rep-utational damages,and emotional distress.

**\*\*COUNT 2 negligence\*\***

19).Facebook owed a duty of care to plaintiff and another individuals to exercise reasonable diligence before making criminal allegations that could result in severe harm.

20).Facebook breached this duty by failing to verify the accuracy of its accusations before reporting plaintiff to NCMEC and law enforcement.

21).This breach of duty directly and proximately caused plaintiff's wrongful arrest,imprisonment,and severe emotional distress.

**\*\*COUNT 3 FALSE LIGHT INVASION OF PRIVACY\*\***

22).Facebook's false and defamatory report publicly misrepresented plaintiff as a criminal engaged in the distribution of child pornography.

23).This misrepresentation placed plaintiff in a false light,causing irreparable harm to his reputation and emotional well-being.

**\*\*COUNT 4 NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS\*\***

24).Facebook's recless and negligent actions caused plaintiff severe emotional distress,including:

a).Wrongful imprisonment.

b).Public shame and reputational damage.

c).Psychological and emotional suffering.

25).Facebook knew or should have known that falsely accusing someone of a heinous crime would cause severe emotional distress.

**\*\*PRAYER FOR RELIEF\*\***

WHEREFORE, plaintiff YASIR QAHTAN SAUD respectfully request that this court enter judgment in his favor and against defendant Meta Platforms, inc, and award the following relief:

- A). **\*\*Compensatory damages\*\*** for reputational harm, emotional distress, financial losses;
- B). **\*\*Punitive damages\*\*** to deter facebook from engaging in similar conduct in the future;
- C). **\*\*A public retraction and correction\*\*** of facebook's false allegations;
- D). **\*\*An injunction\*\*** requiring facebook to reform its reporting process to prevent further wrongful accusations; and
- E). **\*\*Any further relief\*\*** deemed just and proper by this court.

**\*\*DEMAND FOR JURY TRIAL\*\***

plaintiff demands a trial by jury on all claims so triable.

dated: 02/18/2025

pro-se litigant

YASIR QAHTAN SAUD

OAKDALE F.C.I. 2

REG. N: 53668-509

P.O. BOX 5010

OAKDALE LA. 71463

SIGNATURE: \_\_\_\_\_

-PROSE LITIGANT-

## -EXHIBITS-

THE FOLLOWING ATTACHMENTS HEREIN, ARE REQUESTS MADE TO "META PLATFORMS INC." VIA CERTIFIED MAIL REQUESTING TO INFORMALLY RESOLVE THE ISSUE OF ITS DENOUNCEMENT TO THE "NATIONAL CENTER FOR MISSING AND EXPLOITED CHILDREN (NCMEC)" AGAINST ME. THEY DID NOT PROVIDE ME WITH A RESPONSE.

FEDERAL CORRECTIONAL INSTITUTION  
OAKDALE F.C.I.-2

DATE: 12 / 07 / 2024

TO: INFORMATION AND CUSTOMER SERVICES.

DEAR, META PLATFORM'S INC. VERY GOOD DAY TO YOU.

ON: 11/27/2023, I SENT YOU A LETTER (A COPY OF WHICH IS ATTACHED HERE) IT HAS BEEN MORE THAN 5 WEEKS.

BUT I HAVE NOT RECEIVED A RESPONSE FROM YOUR OFFICE. ACCORDING TO THE U.S.P.S. REGISTERED TRACKING NUMBER ON THE CERTIFIED SLIP IT HAS NOT BEEN PLACED IN THEIR SYSTEM. SO I AM NOW REQUESTING OF YOU ON A NEED TO KNOW BASIS IF YOU HAD RECEIVED MY MAIL WHICH IS ADDRESSING A VERY SERIOUS MATTER. A COPY IS HEREBY ENCLOSED JUST IN CASE.

I ANXIOUSLY AWAIT YOUR PROMPT RESPONSE.

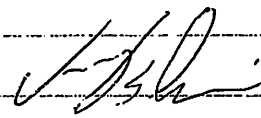
FROM: YASIR QAHTAN SAUD

REG. NO: 53668509

OAKDALE F.C.I.-2

P.O. BOX 5010

OAKDALE, LA. 71463

SIGNATURE: 



FEDERAL CORRECTIONAL INSTITUTION  
OAKDALE FCI- II

Customer Services  
Meta Platforms Inc.  
Facebook Messenger

Date: 6/12/2024

Notice Of Civil Proceedings Under Law

In or around August of 2020, Facebook provided to the National Center for Missing and Exploited Children ("NCMEC") three cybertips regarding the suspected distribution of child pornography through Facebook Messenger, between certain known Internet Protocol (IP) addresses.

According to NCMEC, Facebook reported this activity along with: (1) The IP address used during the transfers; (2) The associated Facebook account subscriber's e-mail addresses; (3) Listed suspect names; (4) Screen names; and (5) The associated suspect images.

One of those persons, according to federal agents, is Mr. Yasir Qahtan Saud, an Iraqi intelligence officer at the service of the U.S. Allied Forces in Iraq, now a war veteran residing in the United States, and the person providing you with this notice, that will be seeking judicial proceedings against this entity for providing false information, Cybertip, report from your company to NCMEC that Mr. Saud had received and distributed child pornography through "Facebok Messenger", this was not true.

First, because Mr. Saud does not have a Facebook account, one that your company can provide that is associated with this activity that you can demonstrate; Second, the FBI seized 36 devices from his home, and according to the inventory nothing was found on those devices. But that is not all the files provided by the government "KBIS3146.mov.", "IMG\_0394.mov"; isoalisv88itbgh810000000\_2981653315255230\_1911262078752860797\_n.mp4";c9bmiztmjx6x7jq116645906\_3102256083198685\_426844030363311179\_n.mp4". Are not or cannot have been on any computer's Facebook page.

Moreover, how does your company obtain a photographic image, e-mail address, and Mr. Saud's name, when he has none on Facebook. The defamation based on false evidence provided by your company has Mr. Saud in prison, so here is the bottom line, I am requesting all the information of Mr. Saud that your company provided to MCMEC. A page of the government's statements of fact is being provided to you so you can see the seriousness of this matter. I need the information to certify the truth of this matter, I need to see who is the liar, your people or the FBI. If your company refuses to provide this information or resort to being silent, I have provided you ample notice that civil judicial action for defamation and racial discrimination.

Respectfully submitted this day: 6/12/ 2024, by  
Yasir Qahtan Saud, Reg. No. 53668-509, Oakdale FCI-2, P.O. Box  
5010 Oakdale , LA. 71463.

Signature:



Dec. 2, 2023

San Francisco CA

7021 0350 0000 2939 9820

SAUD

Facebook

7021 0350 0000 2939 9820

U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com).

**OFFICIAL USE**

Certified Mail Fee	\$4.55
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	
<input type="checkbox"/> Return Receipt (electronic)	
<input type="checkbox"/> Certified Mail Restricted Delivery	
<input type="checkbox"/> Adult Signature Required	
<input type="checkbox"/> Adult Signature Restricted Delivery	
Postage	\$2.45
Total Postage and Fees	\$7.00
Sent To	YASIR GAHTAN SAUD
	Reg. No. 53668-509
	Oakdale F.C.I. #2
	P.O. Box 5010
	Oakdale LA.
	71463
	AB-B-C-20
	71463
Street and Apt. No., or PO Box No.	META PLATFORMS INC.
City, State, ZIP+4®	1 HACKER WAY MENLO PARK, CA. 94025

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions